Request for an Amendment to a §1915(c) Home and Community-Based Services Waiver

1. Request Information

- **A.** The **State** of **Idaho** requests approval for an amendment to the following Medicaid home and community-based services waiver approved under authority of §1915(c) of the Social Security Act.
- **B.** Program Title:

Aged and Disabled Waiver

C. Waiver Number:ID.1076

Original Base Waiver Number: ID.1076.90.R3A.04

D. Amendment Number:

E. Proposed Effective Date: (mm/dd/yy)

05/01/18

Approved Effective Date of Waiver being Amended: 10/01/17

2. Purpose(s) of Amendment

Purpose(s) of the Amendment. Describe the purpose(s) of the amendment:

The purposes of this amendment to Idaho's Aged and Disabled Waiver are as follows:

- 1. To revise the reimbursement methodology information for Residential Habilitation services (Appendix I-2-a); and
- 2. To revise the Composite Overview and Demonstration of Cost-Neutrality Formula (Appendix J-1) and the Estimate of Factor D tables for Waiver Years 1-5 (Appendix J-2-d) to reflect updated residential habilitation service rates based on the revised reimbursement methodology.

3. Nature of the Amendment

Specify:

A. Component(s) of the Approved Waiver Affected by the Amendment. This amendment affects the following component(s) of the approved waiver. Revisions to the affected subsection(s) of these component(s) are being submitted concurrently (check each that applies):

Component of the Approved Waiver	Subsection(s)
₩ Waiver Application	6. I.
Appendix A – Waiver Administration and Operation	
Appendix B – Participant Access and Eligibility	
Appendix C – Participant Services	
Appendix D – Participant Centered Service Planning and Delivery	
Appendix E – Participant Direction of Services	
Appendix F – Participant Rights	
Appendix G – Participant Safeguards	
Appendix H	
Appendix I – Financial Accountability	I. 2. a.
Appendix J – Cost-Neutrality Demonstration	J. 1. J. 2. d.

	Appendix I – Financial Accountability	ı	I. 2. a.		
	Appendix J – Cost-Neutrality Demonstration		J. 1. J. 2. d.		
В.	Nature of the Amendment. Indicate the nature of the changes to	th	e waiver that are propo	ose	d in the amendment (check each that
	applies):				
	■ Modify target group(s)				
	Modify Medicaid eligibility				
	Add/delete services				
	Revise service specifications				
	Revise provider qualifications				
	Increase/decrease number of participants				
	Revise cost neutrality demonstration				
	Add participant-direction of services				
	Other				

To revise financial accountability provisions regarding the methods and standards for setting payment rates for residential habilitation services.

Application for a §1915(c) Home and Community-Based Services Waiver

1. Request Information (1 of 3)	
 A. The State of Idaho requests approval for a Medicaid home and community-based services (HCBS) waiver under the authority of (c) of the Social Security Act (the Act). B. Program Title (optional - this title will be used to locate this waiver in the finder): Aged and Disabled Waiver C. Type of Request: amendment 	§191:
Requested Approval Period: (For new waivers requesting five year approval periods, the waiver must serve individuals who are dually eligible for Medicaid and Medicare.)	
○ 3 years ● 5 years	
Original Base Waiver Number: ID.1076 Draft ID: ID.002.06.02 D. Type of Waiver (select only one): Regular Waiver E. Proposed Effective Date of Waiver being Amended: 10/01/17 Approved Effective Date of Waiver being Amended: 10/01/17	
1. Request Information (2 of 3)	
F. Level(s) of Care. This waiver is requested in order to provide home and community-based waiver services to individuals who, but the provision of such services, would require the following level(s) of care, the costs of which would be reimbursed under the appropriate Medicaid State plan (check each that applies): Hospital Select applicable level of care Hospital as defined in 42 CFR §440.10 If applicable, specify whether the State additionally limits the waiver to subcategories of the hospital level of care:	
	^ >
☐ Inpatient psychiatric facility for individuals age 21 and under as provided in42 CFR §440.160 ✓ Nursing Facility	
Select applicable level of care	
• Nursing Facility as defined in 42 CFR \(\preceq 440.40 \) and 42 CFR \(\preceq 440.155 \) If applicable, specify whether the State additionally limits the waiver to subcategories of the nursing facility level of care	e:
Institution for Mental Disease for persons with mental illnesses aged 65 and older as provided in 42 CFR §440.14 Intermediate Care Facility for Individuals with Intellectual Disabilities (ICF/IID) (as defined in 42 CFR §440.150)	D
If applicable, specify whether the State additionally limits the waiver to subcategories of the ICF/IID level of care:	
1. Request Information (3 of 3)	
G. Concurrent Operation with Other Programs. This waiver operates concurrently with another program (or programs) approved the following authorities Select one:	unde
O Not applicable	
 Applicable Check the applicable authority or authorities: Services furnished under the provisions of §1915(a)(1)(a) of the Act and described in Appendix I 	
Waiver(s) authorized under §1915(b) of the Act. Specify the §1915(b) waiver program and indicate whether a §1915(b) waiver application has been submitted or previous	.clv
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Specify the §1915(b) authorities under which this program operates (check \$1915(b)(1) (mandated enrollment to managed care)	each that applies).	:
\$1915(b)(2) (central broker)		
§1915(b)(3) (employ cost savings to furnish additional services)		
§1915(b)(4) (selective contracting/limit number of providers)		
A program operated under §1932(a) of the Act.		
		1 1
•	Amendment has be	een submitted or pre
•	Amendment has be	een submitted or pre
approved:	Amendment has be	een submitted or pre
approved:	Amendment has be	een submitted or pre
A program authorized under §1915(i) of the Act.	Amendment has be	een submitted or pre
A program authorized under §1915(i) of the Act. A program authorized under §1915(j) of the Act.	Amendment has be	een submitted or pre
Specify the nature of the State Plan benefit and indicate whether the State Plan approved: A program authorized under §1915(i) of the Act. A program authorized under §1915(j) of the Act. A program authorized under §1115 of the Act. Specify the program:	Amendment has be	een submitted or pre

H. Dual Eligiblity for Medicaid and Medicare.

Check if applicable:

▼ This waiver provides services for individuals who are eligible for both Medicare and Medicaid.

2. Brief Waiver Description

Brief Waiver Description. *In one page or less*, briefly describe the purpose of the waiver, including its goals, objectives, organizational structure (e.g., the roles of state, local and other entities), and service delivery methods.

The goal of the Aged & Disabled Waiver is to allow Idaho's elderly and disabled citizens who meet nursing facility level of care to choose to live in a home or community-based setting rather than in an institution. This goal is in keeping with the Idaho Department of Health and Welfare's goals of strengthening individuals, families and communities.

Idaho's elderly and disabled citizens should be able to maintain self-sufficiency, individuality, independence, dignity, choice, and privacy in a safe and cost-effective setting. When possible, services should be available in the participant's own home and/or community regardless of their age, income, or ability, and should encourage the involvement of natural supports, such as family, friends, neighbors, volunteers, church, and others. These principles are built into the structure of Aged & Disabled Waiver, which offers important services in home and community-based settings such as homes and apartments of participants, homes and apartments where participants live with family members, Certified Family Homes, and Residential Assisted Living Facilities.

Individuals seeking services must complete an application for Medicaid with Self-Reliance staff in the Division of Welfare, a division within the Idaho Department of Health and Welfare (referred to hereafter as "the Department"). The Division of Welfare determines financial eligibility for the waiver. The waiver is administered by the Division of Medicaid's Bureau of Long Term Care (BLTC). Requests for waiver services will be sent to one of the appropriate Medicaid offices. A BLTC nurse reviewer will conduct an assessment to assure that nursing facility level of care is met. The nurse reviewer will collaborate with the participant (and/or family or legal representative, as appropriate) in choosing services that ensure the participant can be safely maintained in their choice of living arrangement. The participant (and/or family or legal representative, as appropriate) chooses providers to deliver services. The BLTC is responsible for reassessment annually to make sure the services are being delivered in accordance with the service plan and the services authorized can safely and effectively maintain the participant in their home. The BLTC is also responsible for ensuring that services are delivered by a qualified providers with the skills or training necessary to perform the services. The Idaho Department of Health and Welfare's Division of Licensing and Certification ensures that various types of waiver providers are in compliance with applicable statutes and rules governing their license, certificate, and/or credentialed status. Through the development and implementation of a comprehensive quality improvement strategy, the Division of Medicaid assures compliance with the waiver objectives.

For individuals enrolled in the state's Medicare-Medicaid Coordinated Plan (MMCP), the managed care entity (MCE) will administer the waiver in accordance with the same rules by which BLTC administers the waiver for participants not enrolled in the MMCP. The BLTC will supervise the MCE to ensure compliance with the contract with the Department and this waiver. The MCE will perform, to the extent applicable, the same functions as BLTC for its enrollees who are waiver participants. The BLTC will continue to complete the level of care assessments for all A&D waiver participants, regardless of whether they are enrolled in the MMCP. Any references to duties of the MCE apply only to individuals who are enrolled in the state's MMCP.

3. Components of the Waiver Request

The waiver application consists of the following components. Note: Item 3-E must be completed.

- A. Waiver Administration and Operation. Appendix A specifies the administrative and operational structure of this waiver.
- **B.** Participant Access and Eligibility. Appendix B specifies the target group(s) of individuals who are served in this waiver, the number of participants that the State expects to serve during each year that the waiver is in effect, applicable Medicaid eligibility and posteligibility (if applicable) requirements, and procedures for the evaluation and reevaluation of level of care.
- **C. Participant Services. Appendix C** specifies the home and community-based waiver services that are furnished through the waiver, including applicable limitations on such services.
- **D.** Participant-Centered Service Planning and Delivery. Appendix **D** specifies the procedures and methods that the State uses to develop, implement and monitor the participant-centered service plan (of care).
- E. Participant-Direction of Services. When the State provides for participant direction of services, Appendix E specifies the participant direction opportunities that are offered in the waiver and the supports that are available to participants who direct their services. (Select one):
 Yes. This waiver provides participant direction opportunities. Appendix E is required.

Yes. This waiver provides participant direction opportunities. Appendix E is required.	
No. This waiver does not provide participant direction opportunities. Appendix E is not required.	

- **F.** Participant Rights. Appendix **F** specifies how the State informs participants of their Medicaid Fair Hearing rights and other procedures to address participant grievances and complaints.
- **G.** Participant Safeguards. Appendix G describes the safeguards that the State has established to assure the health and welfare of waiver participants in specified areas.
- H. Quality Improvement Strategy. Appendix H contains the Quality Improvement Strategy for this waiver.

order to use institutional income and resource rules for the medically needy (select one):

- **I. Financial Accountability. Appendix I** describes the methods by which the State makes payments for waiver services, ensures the integrity of these payments, and complies with applicable federal requirements concerning payments and federal financial participation.
- J. Cost-Neutrality Demonstration. Appendix J contains the State's demonstration that the waiver is cost-neutral.

4. Waiver(s) Requested

Not Applicable

.	Comparability. The state requests a warver of the requirements contained in \$1702(a)(10)(b) of the Act in order to provide the
	services specified in Appendix C that are not otherwise available under the approved Medicaid State plan to individuals who: (a)
	require the level(s) of care specified in Item 1.F and (b) meet the target group criteria specified in Appendix B .
В.	Income and Resources for the Medically Needy. Indicate whether the State requests a waiver of §1902(a)(10)(C)(i)(III) of the Act in

Comparability. The State requests a waiver of the requirements contained in \$1902(a)(10)(B) of the Act in order to provide the

	O No	
	O Yes	
C.	Statewideness.	Indicate whether the State requests a waiver of the statewideness requirements in §1902(a)(1) of the Act (select one):
	No	
	O Yes	

If yes, specify the waiver of statewideness that is requested (check each that applies):

Geographic Limitation. A waiver of statewideness is requested in order to furnish services under this waiver only to individuals who reside in the following geographic areas or political subdivisions of the State.

Specify the areas to which this waiver applies and, as applicable, the phase-in schedule of the waiver by geographic area:

Limited Implementation of Participant-Direction. A waiver of statewideness is requested in order to make participant-
direction of services as specified in Appendix E available only to individuals who reside in the following geographic areas or
political subdivisions of the State. Participants who reside in these areas may elect to direct their services as provided by the
State or receive comparable services through the service delivery methods that are in effect elsewhere in the State.
Specify the areas of the State affected by this waiver and, as applicable, the phase-in schedule of the waiver by geographic
area:

In accordance with 42 CFR §441.302, the State provides the following assurances to CMS:

- **A. Health & Welfare:** The State assures that necessary safeguards have been taken to protect the health and welfare of persons receiving services under this waiver. These safeguards include:
 - 1. As specified in **Appendix C**, adequate standards for all types of providers that provide services under this waiver;
 - 2. Assurance that the standards of any State licensure or certification requirements specified in **Appendix C** are met for services or for individuals furnishing services that are provided under the waiver. The State assures that these requirements are met on the date that the services are furnished; and,
 - **3.** Assurance that all facilities subject to §1616(e) of the Act where home and community-based waiver services are provided comply with the applicable State standards for board and care facilities as specified in **Appendix C**.
- **B.** Financial Accountability. The State assures financial accountability for funds expended for home and community-based services and maintains and makes available to the Department of Health and Human Services (including the Office of the Inspector General), the Comptroller General, or other designees, appropriate financial records documenting the cost of services provided under the waiver. Methods of financial accountability are specified in **Appendix I**.
- **C. Evaluation of Need:** The State assures that it provides for an initial evaluation (and periodic reevaluations, at least annually) of the need for a level of care specified for this waiver, when there is a reasonable indication that an individual might need such services in the near future (one month or less) but for the receipt of home and community-based services under this waiver. The procedures for evaluation and reevaluation of level of care are specified in **Appendix B**.
- **D.** Choice of Alternatives: The State assures that when an individual is determined to be likely to require the level of care specified for this waiver and is in a target group specified in **Appendix B**, the individual (or, legal representative, if applicable) is:
 - 1. Informed of any feasible alternatives under the waiver; and,
 - 2. Given the choice of either institutional or home and community-based waiver services. **Appendix B** specifies the procedures that the State employs to ensure that individuals are informed of feasible alternatives under the waiver and given the choice of institutional or home and community-based waiver services.
- E. Average Per Capita Expenditures: The State assures that, for any year that the waiver is in effect, the average per capita expenditures under the waiver will not exceed 100 percent of the average per capita expenditures that would have been made under the Medicaid State plan for the level(s) of care specified for this waiver had the waiver not been granted. Cost-neutrality is demonstrated in Appendix J.
- **F.** Actual Total Expenditures: The State assures that the actual total expenditures for home and community-based waiver and other Medicaid services and its claim for FFP in expenditures for the services provided to individuals under the waiver will not, in any year of the waiver period, exceed 100 percent of the amount that would be incurred in the absence of the waiver by the State's Medicaid program for these individuals in the institutional setting(s) specified for this waiver.
- **G. Institutionalization Absent Waiver:** The State assures that, absent the waiver, individuals served in the waiver would receive the appropriate type of Medicaid-funded institutional care for the level of care specified for this waiver.
- **H. Reporting:** The State assures that annually it will provide CMS with information concerning the impact of the waiver on the type, amount and cost of services provided under the Medicaid State plan and on the health and welfare of waiver participants. This information will be consistent with a data collection plan designed by CMS.
- **I. Habilitation Services.** The State assures that prevocational, educational, or supported employment services, or a combination of these services, if provided as habilitation services under the waiver are: (1) not otherwise available to the individual through a local educational agency under the Individuals with Disabilities Education Act (IDEA) or the Rehabilitation Act of 1973; and, (2) furnished as part of expanded habilitation services.
- **J. Services for Individuals with Chronic Mental Illness.** The State assures that federal financial participation (FFP) will not be claimed in expenditures for waiver services including, but not limited to, day treatment or partial hospitalization, psychosocial rehabilitation services, and clinic services provided as home and community-based services to individuals with chronic mental illnesses if these individuals, in the absence of a waiver, would be placed in an IMD and are: (1) age 22 to 64; (2) age 65 and older and the State has not included the optional Medicaid benefit cited in 42 CFR §440.140; or (3) age 21 and under and the State has not included the optional Medicaid benefit cited in 42 CFR § 440.160.

6. Additional Requirements

Note: Item 6-I must be completed.

- **A.** Service Plan. In accordance with 42 CFR §441.301(b)(1)(i), a participant-centered service plan (of care) is developed for each participant employing the procedures specified in **Appendix D**. All waiver services are furnished pursuant to the service plan. The service plan describes: (a) the waiver services that are furnished to the participant, their projected frequency and the type of provider that furnishes each service and (b) the other services (regardless of funding source, including State plan services) and informal supports that complement waiver services in meeting the needs of the participant. The service plan is subject to the approval of the Medicaid agency. Federal financial participation (FFP) is not claimed for waiver services furnished prior to the development of the service plan or for services that are not included in the service plan.
- **B.** Inpatients. In accordance with 42 CFR §441.301(b)(1)(ii), waiver services are not furnished to individuals who are in-patients of a hospital, nursing facility or ICF/IID.
- **C. Room and Board**. In accordance with 42 CFR §441.310(a)(2), FFP is not claimed for the cost of room and board except when: (a) provided as part of respite services in a facility approved by the State that is not a private residence or (b) claimed as a portion of the rent and food that may be reasonably attributed to an unrelated caregiver who resides in the same household as the participant, as provided in **Appendix I**.
- D. Access to Services. The State does not limit or restrict participant access to waiver services except as provided in Appendix C.
- **E.** Free Choice of Provider. In accordance with 42 CFR §431.151, a participant may select any willing and qualified provider to furnish waiver services included in the service plan unless the State has received approval to limit the number of providers under the provisions of §1915(b) or another provision of the Act.
- **F. FFP Limitation**. In accordance with 42 CFR §433 Subpart D, FFP is not claimed for services when another third-party (e.g., another third party health insurer or other federal or state program) is legally liable and responsible for the provision and payment of the service. FFP also may not be claimed for services that are available without charge, or as free care to the community. Services will not be considered to be without charge, or free care, when (1) the provider establishes a fee schedule for each service available and (2) collects insurance information from all those served (Medicaid, and non-Medicaid), and bills other legally liable third party insurers. Alternatively, if a provider certifies that a particular legally liable third party insurer does not pay for the service(s), the provider may not generate further bills for that insurer for that annual period.
- **G. Fair Hearing:** The State provides the opportunity to request a Fair Hearing under 42 CFR §431 Subpart E, to individuals: (a) who are not given the choice of home and community-based waiver services as an alternative to institutional level of care specified for this waiver; (b) who are denied the service(s) of their choice or the provider(s) of their choice; or (c) whose services are denied, suspended, reduced or terminated. **Appendix F** specifies the State's procedures to provide individuals the opportunity to request a Fair Hearing, including providing notice of action as required in 42 CFR §431.210.
- **H. Quality Improvement**. The State operates a formal, comprehensive system to ensure that the waiver meets the assurances and other requirements contained in this application. Through an ongoing process of discovery, remediation and improvement, the State assures the health and welfare of participants by monitoring: (a) level of care determinations; (b) individual plans and services delivery; (c) provider qualifications; (d) participant health and welfare; (e) financial oversight and (f) administrative oversight of the waiver. The State further assures that all problems identified through its discovery processes are addressed in an appropriate and timely manner, consistent with the severity and nature of the problem. During the period that the waiver is in effect, the State will implement the Quality Improvement Strategy specified in **Appendix H**.
- **I. Public Input.** Describe how the State secures public input into the development of the waiver: The Department solicited meaningful public input for this waiver amendment as follows:

First Round of Solicitation in Connection with Proposed Amendment to Waiver (ID.1076.R04)

- 1. Department contracted with an independent accounting firm to perform a cost survey of residential habilitation providers. Process and results of cost survey can be found at http://healthandwelfare.idaho.gov/Portals/0/Medical/MedicaidCHIP/SupportedLivingReport.pdf.
- 2. Department sent written notice and request for comment on proposed waiver amendment to designated tribal representatives of Idaho's 6 federally recognized tribes on August 12, 2016. Department received no comments from Tribal representatives.
- 3. During October 2016, Department sent written notification and request for comment on proposed waiver amendment to providers and participants.
- 4. Department held a public hearing on October 24, 2016 to discuss results of cost survey with stakeholders.
- 5. On November 15 and 16, 2016, Department published public notice of proposed waiver amendment in newspaper of widest circulation in each Idaho city with population of 50,000 or more and on the internet at http://healthandwelfare.idaho.gov/Medical/Medicaid/tabid/123/Default.aspx (Department's website). Copies of public notice and proposed waiver amendment were made available for public review on Department's website and during regular business hours at specified agency locations in each Idaho county. The public was given the opportunity to comment on the proposed waiver

amendment for a period of at least 30 days.

- 6. Department held a public hearing on November 29, 2016 for individuals to provide oral comment on proposed waiver amendment.
- 7. Department received a total of 32 timely comments. The Department did not make changes to its waiver amendment based on the comments received. A document summarizing comments received and Department's responses was posted on Department's website and sent to CMS with a copy of all written comments received.

Second Round of Solicitation in Connection with Waiver Renewal Application (ID.1076.R06)

- 1. Department sent written notice of proposed waiver renewal on March 9, 2017 and a second notice soliciting comment regarding proposed waiver renewal on April 25, 2017 to designated tribal representatives of the 6 federally recognized tribes in Idaho. Department received no comments from Tribal representatives.
- 2. On April 25, 2017, Department published public notice of proposed waiver renewal in newspapers of widest circulation in each Idaho city with a population of 50,000 or more and on Department's website. Copies of public notice and the proposed waiver renewal were made available for public review on Department's website and during regular business hours at the Medicaid Central Office and the seven regional Medicaid services offices. The public was given opportunity to comment on proposed waiver renewal for a period of at least 30 days.
- 3. During May 2017, Department held public hearings in each of its 3 regional hubs for individuals to provide oral comment on proposed waiver renewal.
- 4. Department received a total of 13 timely comments. Department did not make changes to its waiver renewal application based on comments received. A document summarizing the comments received and Department's responses was posted on Department's website and sent to CMS with a copy of all written comments received.
- 5. At stakeholders' request, Department surveyed providers to identify number of high-supports participants served by one direct care staff person at one time. Results of ratio survey were used to extrapolate residential habilitation base rate into an appropriate group support service rates.

Third Round of Solicitation in Connection with this Proposed Waiver Amendment (ID.0076.R06.02)

- 1. Department sent written notice of the anticipated waiver amendment on October 27, 2017 and a second notice soliciting comment regarding proposed waiver amendment on [November 28, 2017] to designated tribal representatives of the 6 federally recognized tribes in Idaho. The Department received [##] comments from Tribal representatives.
- 2. On [November 28, 2017], Department published public notice of proposed waiver amendment in newspapers of widest circulation in each Idaho city with a population of 50,000 or more and on Department's website. Copies of public notice and proposed waiver amendment were made available for public review on Department's website and during regular business hours at specified agency locations in each Idaho county. The public was given opportunity to comment on proposed waiver amendment for a period of at least 30 days.
- 3. During December 2017, Department will hold public hearings in each of its 3 regional hubs for individuals to provide oral comment on proposed waiver amendment.
- 4. A document summarizing the comments received and Department's responses will be posted on Department's website.
- **J. Notice to Tribal Governments.** The State assures that it has notified in writing all federally-recognized Tribal Governments that maintain a primary office and/or majority population within the State of the State's intent to submit a Medicaid waiver request or renewal request to CMS at least 60 days before the anticipated submission date is provided by Presidential Executive Order 13175 of November 6, 2000. Evidence of the applicable notice is available through the Medicaid Agency.
- K. Limited English Proficient Persons. The State assures that it provides meaningful access to waiver services by Limited English Proficient persons in accordance with: (a) Presidential Executive Order 13166 of August 11, 2000 (65 FR 50121) and (b) Department of Health and Human Services "Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons" (68 FR 47311 August 8, 2003). Appendix B describes how the State assures meaningful access to waiver services by Limited English Proficient persons.

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A.	The Medicaid agency representative with whom CMS should communicate regarding the waiver is:
	Last Name:

Fernandez

identified by the review, the provider agency shall submit to IDHW a corrective action plan for addressing the identified deficiencies. This corrective action plan shall be submitted to IDHW within 45 calendar days of receiving the results of a quality assurance review. Upon request, an agency shall also forward to IDHW the results of any implemented corrective action plan.

5. The IDHW Contract Monitor will issue a Monitoring Report to the MCE that identifies in writing the Performance Indicator (s) monitored, and that summarizes the preliminary results with the MCE. The MCE utilizes the same sampling methods as IDHW for performance and quality improvement measures. Upon request by the MCE, IDHW will meet with the MCE within ten (10) business days of their receipt of the Monitoring Report regarding the results. The MCE may dispute the findings via written appeal to the Contract Monitor within ten (10) business days of issuance of the report. The MCE must specifically address each disputed finding and justification for the appeal of the finding. The MCE is required to provide all documents necessary to dispute monitor results with its written appeal. The IDHW will render a final written decision on the appeal to the MCE within ten (10) business days of receipt of the MCE's dispute information, unless the parties agree in writing to extend the decision period.

If the MCE does not dispute the findings, the MCE shall have ten (10) business days from the date of the IDHW's monitoring report to cure the deficiencies found. If the MCE appeals the monitoring report, the MCE shall have ten (10) business days from the date of IDHW's final written decision to cure the deficiencies. If the IDHW is not satisfied that the MCE has resolved the deficiencies, or made substantial progress toward resolution, the IDHW may assess the amounts listed in the Scope of Work as liquidated damages for each day the deficiency remains uncured.

ii.	Remediation Data Aggregation	
	Domodiation related Data Aggregation and	l Analysis (including tr

Responsible Party(check each that applies):	Frequency of data aggregation and analysis(check each that applies):
✓ State Medicaid Agency	☐ Weekly
Operating Agency	☐ Monthly
☐ Sub-State Entity	✓ Quarterly
✓ Other Specify: MCE	✓ Annually
	Continuously and Ongoing
	Other Specify:

c. Timelines

When the State does not have all elements of the Quality Improvement Strategy in place, provide timelines to design methods for discovery and remediation related to the assurance of Financial Accountability that are currently non-operational.

Please provide a detailed strategy for assuring Financial Accountability, the specific timeline for implementing identified strategies, and the parties responsible for its operation.

Appendix I: Financial Accountability

I-2: Rates, Billing and Claims (1 of 3)

a. Rate Determination Methods. In two pages or less, describe the methods that are employed to establish provider payment rates for waiver services and the entity or entities that are responsible for rate determination. Indicate any opportunity for public comment in the process. If different methods are employed for various types of services, the description may group services for which the same method is employed. State laws, regulations, and policies referenced in the description are available upon request to CMS through the Medicaid agency or the operating agency (if applicable).

The Department provides public notice of significant reimbursement changes in accordance with 42 CFR § 447.205 (made applicable to waivers through 42 CFR § 441.304(e)). The Department publishes public notice of proposed reimbursement changes in multiple newspapers throughout the State and on the Department's website at www.healthandwelfare.idaho.gov. Copies of public notices and text of proposed significant reimbursement changes are made available for public review on Department's website and during regular

business hours at agency locations in each Idaho county as identified in each public notice.. Additionally, payment rates are published on our website at www.healthandwelfare.idaho.gov for the public to access.

The Department provides opportunity for meaningful public input related to proposed reimbursement changes in accordance with 42 CFR § 441.304(f). The Department solicits comments from the public (including beneficiaries, providers and other stakeholders) through its public notice process and through public hearings related to the proposed reimbursement changes. The public is given the opportunity to comment on the proposed reimbursement changes for at least 30 days prior to the submission of a waiver amendment to CMS. Additionally, when administrative rules are promulgated in connection with reimbursement changes, the proposed rules are published in the Idaho Administrative Bulletin and the public is given the opportunity to comment.

Waiver service providers will be paid on a fee-for-service basis as established by the Department depending on the type of service provided. The Bureau of Financial Operations is responsible for rate determinations. The Department will ensure that the MCE reimburses providers at a rate no less than the current Medicaid Provider rates.

The Department solicits comments at public hearings when administrative rules related to rate determination methods are promulgated. Administrative rules are published when there are changes to rate determination methods. The public may submit comments on these rules for 21 days after the date of publishing.

Pursuant to 42 CFR §447.205, the Department gives notice of its proposed reimbursement changes by publishing legal notices throughout the State to inform providers about any change. Additionally, payment rates are published on our website at www.healthandwelfare.idaho.gov for participants to access.

Please see below for services and reimbursement methodology information:

Adult Day Health and Home Delivered Meal Services. The initial rate was set in 1999 based on time studies in nursing facilities.

Residential Habilitation. The Department will survey current residential habilitation providers to identify the actual cost of providing residential habilitation services (Cost Survey). Reimbursement rates will be based on surveyed data and derived using a combination of four cost components – direct care staff wages, employer related expenditures, program related costs, and indirect general and administrative costs.

The individual components of the rate will be determined as follows: (1) the direct care staff wage component will be determined using either the wage for a comparable Bureau of Labor Statistics (BLS) occupation title, or the weighted average hourly rate from surveyed data if there is no comparable BLS occupation title; (2) the employer related expenditure component will be determined by multiplying the direct care staff wage by the cumulative percentage of employer costs for employee compensation identified by BLS for the West Region, Mountain Division and the internal revenue service employer cost for social security benefit and Medicare benefit; (3) the program related cost component will be determined by identifying the 75th percentile of the ranked program related costs from the surveyed data; and (4) the indirect general and administrative cost component will be determined by identifying the 75th percentile of the ranked general and administrative costs from the surveyed data.

Consultation Services, Personal Emergency Response System Services, Day Habilitation and Supported Employment - The initial rate was set back in 1999 based on time studies in nursing facilities. Going forward, the rate is set based on a labor model that uses a Staff Support Hour (SSH) rate approach, which involves developing a single rate for a unit of staff time spent providing services for an individual.

Attendant Care, Homemaker Services, Companion Services, Chore Services, and Respite Care Services – Section 16.03.10.037.02 requires the Department to conduct a survey when there are identified access issues. As a result, the rate was developed from a cost survey conducted in 2016. The surveyed results of four cost components were combined to arrive at an hourly unit rate. Since these services are identified as personal care service, section 16.03.10.307 followed. The hourly rate calculation was determined using the following reimbursement methodology. The Department followed IDAPA 16.03.10.307.04.a in calculating a direct care wage. This section states the Department will establish Personal Assistance Agency rates for personal assistance services based on the WAHR. The Department followed IDAPA 16.03.10.307.04.b in calculating a supplemental component. This section states the Department will calculate a supplemental component using costs reported for travel, administration, training, and payroll taxes and fringe benefits (employment related expenditures, program related costs, and indirect general and administrative costs).

Adult Residential Care - This service is paid on a per diem basis based on the number of hours and types of assistance required by the participant as identified in the Uniform Assessment Instrument.

Non-medical Transportation - A study is conducted that evaluates the actual costs of fuel reasonably incurred by the typical non-commercial transportation provider whose personal vehicle averages fifteen (15) miles per gallon.

Specialized Medical Equipment & Supplies - For codes that are manually priced, including miscellaneous codes, a copy of the manufacturer's suggested retail pricing (MSRP) or an invoice or quote from the manufacturer is required. Reimbursement will be seventy-five percent (75%) of MSRP. If pricing documentation is the invoice, reimbursement will be at cost plus ten percent (10%), plus shipping (if that documentation is provided). For codes that are not manually priced, the rate is based on the Medicaid fee schedule price.

Environmental Accessibility Adaptations - For adaptations over \$500, three bids are required if it is possible to obtain three bids. The lowest bid which meets the participant's needs is selected.

Nursing Services - These services are paid on a uniform reimbursement rate based on an annual survey conducted by the Department.

The contract between the Department and the MCE shall be a firm fixed fee, indefinite quantity contract for services specified in the Scope of Work. For payment purposes, a capitated payment is calculated based on the current eligible MMCP participant count multiplied by the per member per month (PMPM) figure and is intended to be adequate to support participant access to, and utilization of covered services, including administrative costs. The total PMPM payment is comprised of two (2) components; the Medical capitation and the blended Long Term Services and Supports (LTSS). Once the eligible Enrollee count by enrollment status is determined for the contract, the blended LTSS rate will remain in effect through the contract period.

b. Flow of Billings. Describe the flow of billings for waiver services, specifying whether provider billings flow directly from providers to the State's claims payment system or whether billings are routed through other intermediary entities. If billings flow through other intermediary entities, specify the entities:

For services provided on a Fee For Service (FFS) basis, provider billing flows directly from the provider to the State's claim payment system. Health PAS Administrator (QNXT) is Idaho's Management Information System (MMIS).

Providers for participants enrolled in the MMCP bill the MCE (or the MCE's subcontractor, if applicable) for all services rendered.

Appendix I: Financial Accountability

I-2: Rates, Billing and Claims (2 of 3)

c.	Certifying Public Expenditures (select one):
	No. State or local government agencies do not certify expenditures for waiver services.
	 Yes. State or local government agencies directly expend funds for part or all of the cost of waiver services and certif their State government expenditures (CPE) in lieu of billing that amount to Medicaid.

Selec	t at	least	one:

Smoothy (a) the State accomment against a general and according multiple armonditures for visiting completely between the control of the state of th
Specify: (a) the State government agency or agencies that certify public expenditures for waiver services; (b) how it is assured that the CPE is based on the total computable costs for waiver services; and, (c) how the State verifies that the certified public
expenditures are eligible for Federal financial participation in accordance with 42 CFR §433.51(b).(Indicate source of
revenue for CPEs in Item I-4-a.)

Certified Public Expenditures (CPE) of Local Government Agencies.

Specify: (a) the local government agencies that incur certified public expenditures for waiver services; (b) how it is assured that the CPE is based on total computable costs for waiver services; and, (c) how the State verifies that the certified public expenditures are eligible for Federal financial participation in accordance with 42 CFR §433.51(b). (Indicate source of revenue for CPEs in Item I-4-b.)

Appendix I: Financial Accountability

I-2: Rates, Billing and Claims (3 of 3)

d. Billing Validation Process. Describe the process for validating provider billings to produce the claim for federal financial participation, including the mechanism(s) to assure that all claims for payment are made only: (a) when the individual was eligible for Medicaid waiver payment on the date of service; (b) when the service was included in the participant's approved service plan; and, (c) the services were provided:

The following are the processes employed by the State to validate provider billing to produce the claims for FFP:

J-1: Composite Overview and Demonstration of Cost-Neutrality Formula

Composite Overview. Complete the fields in Cols. 3, 5 and 6 in the following table for each waiver year. The fields in Cols. 4, 7 and 8 are auto-calculated based on entries in Cols 3, 5, and 6. The fields in Col. 2 are auto-calculated using the Factor D data from the J-2-d Estimate of Factor D tables. Col. 2 fields will be populated ONLY when the Estimate of Factor D tables in J-2-d have been completed.

Level(s) of Care: Nursing Facility

Col. 1 Col. 2 Col. 3		Col. 4	Col. 5	Col. 6	Col. 7	Col. 8	
Year Factor D		Factor D'	Total: D+D'	Factor G	Factor G'	Total: G+G'	Difference (Col 7 less Column4)
1	7440.47	9674.00	17114.47	68174.00	8270.00	76444.00	59329.53
2	7626.40	9754.00	17380.40	70067.00	8684.00	78751.00	61370.60
3	7626.26	9834.00	17460.26	71961.00	9118.00	81079.00	63618.74
4	7625.44	9914.00	17539.44	73854.00	9574.00	83428.00	65888.56
5	7625.30	9994.00	17619.30	75747.00	10053.00	85800.00	68180.70

Appendix J: Cost Neutrality Demonstration

J-2: Derivation of Estimates (1 of 9)

a. Number Of Unduplicated Participants Served. Enter the total number of unduplicated participants from Item B-3-a who will be served each year that the waiver is in operation. When the waiver serves individuals under more than one level of care, specify the number of unduplicated participants for each level of care:

Table: J-2-a: Unduplicated Participants

Waiver Year	Total Unduplicated Number of Participants (from Item B-3-a)	Distribution of Unduplicated Participants by Level of Care (if applicable) Level of Care: Nursing Facility
Year 1	11485	11485
Year 2	11944	11944
Year 3	12422	12422
Year 4	12919	12919
Year 5	13436	13436

Appendix J: Cost Neutrality Demonstration

J-2: Derivation of Estimates (2 of 9)

b. Average Length of Stay. Describe the basis of the estimate of the average length of stay on the waiver by participants in item J-2-a.

To estimate the waiver length of stay, the A&D waiver CMS 372 reports for the previous three years were used. Days are limited to 365.

Appendix J: Cost Neutrality Demonstration

J-2: Derivation of Estimates (3 of 9)

- **c. Derivation of Estimates for Each Factor.** Provide a narrative description for the derivation of the estimates of the following factors.
 - i. Factor D Derivation. The estimates of Factor D for each waiver year are located in Item J-2-d. The basis for these estimates is as follows:

Historical waiver expenditure data and user data from the 372 reports was used to assist in projecting forward the estimate for the five-year waiver period.

The estimated number of users of each service was calculated by reviewing the number of users of each service on the 372 report, and increasing that number at the same rate that the overall number of waiver participants is expected to increase during the five-year waiver period.

The MMIS was used to derive the historical number of units per user. Estimated units per user were held constant through the five years of the waiver renewal.

The starting cost per unit was derived from the current A & D Fee Schedule. The cost per unit was held constant through the five years of the waiver renewal as the historical changes in reimbursement rates did not result in a predictable pattern to forecast. The waiver will be amended in the event that cost per unit fluctuates over time.

ii. Factor D' Derivation. The estimates of Factor D' for each waiver year are included in Item J-1. The basis of these estimates is as follows:

Historical Medicaid expenditures for A & D waiver participants from the internal MMIS system were reviewed and projected forward over the five year estimate period, based on the historical trend.

Factor D' does not include the costs of prescription drugs.

iii. Factor G Derivation. The estimates of Factor G for each waiver year are included in Item J-1. The basis of these estimates is as follows:

Estimates were derived from actual data available in the internal MMIS system and then projected forward over the five year estimate period, based on the historical trend.

iv. Factor G' Derivation. The estimates of Factor G' for each waiver year are included in Item J-1. The basis of these estimates is as follows:

Estimates were derived from actual data available in the internal MMIS system and then projected forward over the five year estimate period, based on the historical trend.

Appendix J: Cost Neutrality Demonstration

J-2: Derivation of Estimates (4 of 9)

Component management for waiver services. If the service(s) below includes two or more discrete services that are reimbursed separately, or is a bundled service, each component of the service must be listed. Select "manage components" to add these components.

Waiver Services	
Adult Day Health	
Day Habilitation	
Homemaker	
Residential Habilitation	
Respite	
Supported Employment	
Attendant Care	
Adult Residential Care	
Chore Service	
Companion Services	
Consultation	
Environmental Accessibility Adaptations	
Home Delivered Meals	
Non-medical Transportation	
Personal Emergency Response System	
Skilled Nursing	
Specialized Medical Equipment and Supplies	

Appendix J: Cost Neutrality Demonstration

J-2: Derivation of Estimates (5 of 9)

d. Estimate of Factor D.

ii. Concurrent §1915(b)/§1915(c) Waivers, or other authorities utilizing capitated arrangements (i.e., 1915(a), 1932(a), Section 1937). Complete the following table for each waiver year. Enter data into the Unit, # Users, Avg. Units Per User, and Avg. Cost/Unit fields for all the Waiver Service/Component items. If applicable, check the capitation box next to that service. Select Save and Calculate to automatically calculate and populate the Component Costs and Total Costs fields. All fields in this table must be completed in order to populate the Factor D fields in the J-1 Composite Overview table.

✓						
						181575.96
	Per Member Per Mo	8	12.00	0.01	0.96	
	Per 15 Minute Unit	90	1345.00	1.50	181575.00	
						27361.20
	Per 15 Minute Unit	2	3020.00	4.53	27361.20	
✓	Per Member Per Mo	0	12.00	0.01	0.00	
\sqcap						19656337.04
✓	Per Member Per Mo	190	12.00	0.01	22.80	
	Per 15 Minute Unit	6416	764.00	4.01	19656314.24	
\sqcap						2785356.24
	Per Diem	24	350.00	331.59	2785356.00	
✓	Per Member Per Mo	2	12.00	0.01	0.24	
П						129020.04
	Per 15 Minute Unit	92	371.00	3.78	129018.96	
✓	Per Member Per Mo	9	12.00	0.01	1.08	
П						37884.12
✓	Per Member Per Mo	1	12.00	0.01	0.12	
	Per 15 Minute Unit	8	902.00	5.25	37884.00	
						9671049.51
✓	Per Member Per Mo	173	12.00	0.01	20.76	
	Per 15 Minute Unit	1845	1205.00	4.35	9671028.75	
П						45118296.16
	Per Diem	4913	248.00	37.03	45118240.72	
✓	Per Member Per Mo	462	12.00	0.01	55.44	
\top						185206.60
					185202.88	
GRAND TOTAL: Total: Services included in capitation: Total: Services not included in capitation: Services not included Participants: Factor D (Divide total by number of participants): Services included in capitation: Services not included in capitation:						
		Per 15 Minute Unit Per Member Per Mo Per Member Per Mo Per 15 Minute Unit Per Diem Per Member Per Mo Per Diem Per Diem Total: Services in Total: Services in Total Estimated Unduplity Factor D (Divide total by numb Services not in Services not	Per 15 Minute Unit 2 Per Member Per Mo 0 Per Member Per Mo 190 Per 15 Minute Unit 6416 Per Diem 24 Per Member Per Mo 2 Per Member Per Mo 9 Per Member Per Mo 9 Per Member Per Mo 1 Per 15 Minute Unit 92 Per Member Per Mo 1 Per 15 Minute Unit 88 Per Member Per Mo 1 Per 15 Minute Unit 1 Per Member Per Mo 1 Per 15 Minute Unit 1 Per Member Per Mo 1 Per Diem 4913 Fer Member Per Mo 462	Per 15 Minute Unit 2 3020.00 Per Member Per Mo 0 12.00 Per Member Per Mo 190 12.00 Per 15 Minute Unit 6416 764.00 Per 15 Minute Unit 6416 764.00 Per Diem 24 350.00 Per Member Per Mo 2 12.00 Per Member Per Mo 9 12.00 Per Member Per Mo 9 12.00 Per Member Per Mo 1 12.00 Per 15 Minute Unit 8 902.00 Per 15 Minute Unit 8 902.00 Per 15 Minute Unit 1845 1205.00 Per 15 Minute Unit 1845 1205.00 Per Diem 4913 248.00 Per Diem 4913 248.00 Per Member Per Mo 462 12.00 Per Member Per Mo 462 12.00 Per Member Per Mo 462 12.00 Per Member Per Mo 462 12.00	Per 15 Minute Unit 2 3020.00 4.53	Per 15 Minute Unit 2 3020.00 4.53 27361.20

Waiver Service/ Component	Capi- tation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost	
		Per 15 Minute Unit	332	152.00	3.67			
Chore Service MMCP	✓	Per Member Per Mo	31	12.00	0.01	3.72		
Companion Services Total:							3426429.39	
Companion Services MMCP	✓	Per Member Per Mo	48	12.00	0.01	5.76		
Companion Services		Per 15 Minute Unit	511	1689.00	3.97	3426423.63		
Consultation Total:							4854.48	
Consultation MMCP	✓	Per Member Per Mo	11	12.00	0.01	1.32		
Consultation		Per 15 Minute Unit	122	5.20	7.65	4853.16		
Environmental Accessibility Adaptations Total:							85519.92	
Environmental Accessibility Adaptations		Per Job	24	1.00	3563.32	85519.68		
Environmental Accessibility Adaptations MMCP	✓	Per Member Per Mo	2	12.00	0.01	0.24		
Home Delivered Meals Total:							2301965.46	
Home Delivered Meals		Per Meal	2019	218.00	5.23	2301942.66		
Home Delivered Meals MMCP	✓	Per Member Per Mo	190	12.00	0.01	22.80		
Non-medical Transportation Total:							227682.40	
Non-medical Transportation MMCP	✓	Per Member Per Mo	88	12.00	0.01	10.56		
Non-medical Transportation		Per Mile	934	554.00	0.44	227671.84		
Personal Emergency Response System Total:							503791.67	
PERS Installation and 1st Month Rent		Per Month (+ Install:	335	1.00	56.89	19058.15		
PERS Monthly Rent		Per Month	1592	9.00	33.83	484716.24		
Personal Emergency Response System MMCP	✓	Per Member Per Mo	144	12.00	0.01	17.28		
Skilled Nursing Total:							1039564.52	
RN Nursing Services		Per 15 Minute Unit	131	33.00	10.19	44051.37		
LPN Nursing Services		Per 15 Minute Unit	111	619.00	7.31	502262.79		
Skilled Nursing MMCP	✓	Per Member Per Mo	453	12.00	0.01	54.36		
Nursing Supervisory Visits		Per Visit	4840	2.00	50.95	493196.00		
GRAND TOTAL: Total: Services included in capitation: Total: Services not included in capitation: Total Estimated Unduplicated Participants: Factor D (Divide total by number of participants):								

Services included in capitation: Services not included in capitation:

Average Length of Stay on the Waiver:

7440.47 0.02

7440.45

Waiver Service/ Component	Capi- tation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost	
Specialized Medical Equipment and Supplies Total:							71847.82	
Specialized Medical Equipment and Supplies MMCP	✓	Per Member Per Mo	6	12.00	0.01	0.72		
Specialized Medical Equipment and Supplies		Per Piece of Equipm	65	2.00	552.67	71847.10		
	GRAND TOTAL:							
		Total: Services in	cluded in capitation:				218.16	
		Total: Services not in	cluded in capitation:				85453524.37	
		Total Estimated Undupli	cated Participants:				11485	
	Fac	tor D (Divide total by numb	er of participants):				7440.47	
Services included in capitation:							0.02	
Services not included in capitation:							7440.45	
	Average Length of Stay on the Waiver:							

Appendix J: Cost Neutrality Demonstration

J-2: Derivation of Estimates (6 of 9)

d. Estimate of Factor D.

ii. Concurrent §1915(b)/§1915(c) Waivers, or other authorities utilizing capitated arrangements (i.e., 1915(a), 1932(a), Section 1937). Complete the following table for each waiver year. Enter data into the Unit, # Users, Avg. Units Per User, and Avg. Cost/Unit fields for all the Waiver Service/Component items. If applicable, check the capitation box next to that service. Select Save and Calculate to automatically calculate and populate the Component Costs and Total Costs fields. All fields in this table must be completed in order to populate the Factor D fields in the J-1 Composite Overview table.

Waiver Service/ Component	Capi- tation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
Adult Day Health Total:							187628.58
Adult Day Health MMCP	✓	Per Member Per Mo	9	12.00	0.01	1.08	
Adult Day Health		Per 15 Minute Unit	93	1345.00	1.50	187627.50	
Day Habilitation Total:							27361.20
Day Habilitation		Per 15 Minute Unit	2	3020.00	4.53	27361.20	
Day Habilitation MMCP	✓	Per Member Per Mo	0	12.00	0.01	0.00	
Homemaker Total:							21208419.16
Homemaker MMCP	✓	Per Member Per Mo	197	12.00	0.01	23.64	
Homemaker		Per 15 Minute Unit	6673	764.00	4.16	21208395.52	
Residential Habilitation Total:							3831187.74
Residential Habilitation		Per Diem	25	350.00	437.85	3831187.50	
Residential Habilitation MMCP	✓	Per Member Per Mo	2	12.00	0.01	0.24	
GRAND TOTAL: Total: Services included in capitation: Total: Services not included in capitation: Total Estimated Unduplicated Participants: Factor D (Divide total by number of participants): Services included in capitation: Services not included in capitation: Average Length of Stay on the Waiver:							

Waiver Service/ Component	Capi- tation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost				
Respite Total:							148163.64				
Respite		Per 15 Minute Unit	96	371.00	4.16	148162.56					
Respite MMCP	✓	Per Member Per Mo	9	12.00	0.01	1.08					
Supported Employment Total:							37884.12				
Supported Employment MMCP	✓	Per Member Per Mo	1	12.00	0.01	0.12					
Supported Employment		Per 15 Minute Unit	8	902.00	5.25	37884.00					
Attendant Care Total:							10382675.15				
Attendant Care MMCP	✓	Per Member Per Mo	180	12.00	0.01	21.60					
Attendant Care		Per 15 Minute Unit	1919	1205.00	4.49	10382653.55					
Adult Residential Care Total:							46918252.56				
Adult Residential Care		Per Diem	5109	248.00	37.03	46918194.96					
Adult Residential Care MMCP	✓	Per Member Per Mo	480	12.00	0.01	57.60					
Chore Service Total:							210288.24				
Chore Service		Per 15 Minute Unit	345	152.00	4.01	210284.40					
Chore Service MMCP	✓	Per Member Per Mo	32	12.00	0.01	3.84					
Companion Services Total:							3730939.44				
Companion Services MMCP	✓	Per Member Per Mo	50	12.00	0.01	6.00					
Companion Services		Per 15 Minute Unit	531	1689.00	4.16	3730933.44					
Consultation Total:							5053.50				
Consultation MMCP	✓	Per Member Per Mo	12	12.00	0.01	1.44					
Consultation		Per 15 Minute Unit	127	5.20	7.65	5052.06					
Environmental Accessibility Adaptations Total:							89083.24				
Environmental Accessibility Adaptations		Per Job	25	1.00	3563.32	89083.00					
Environmental Accessibility Adaptations MMCP	✓	Per Member Per Mo	2	12.00	0.01	0.24					
Home Delivered Meals Total:							2394317.64				
Home Delivered Meals		Per Meal	2100	218.00	5.23	2394294.00					
Home Delivered Meals MMCP			GRAND TOTAL:			23.64	91089730.60				
	Total: Services included in capitation: Total: Services not included in capitation: Total Estimated Unduplicated Participants: Fortan D. Obsida total by namely of participants)										

Factor D (Divide total by number of participants):

Services included in capitation:

Services not included in capitation:

Average Length of Stay on the Waiver:

7626.40

285

0.02 7626.38

Waiver Service/ Component	Capi- tation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
	~	Per Member Per Mo	197	12.00	0.01		
Non-medical Transportation Total:							236701.88
Non-medical Transportation MMCP	✓	Per Member Per Mo	91	12.00	0.01	10.92	
Non-medical Transportation		Per Mile	971	554.00	0.44	236690.96	
Personal Emergency Response System Total:							524074.93
PERS Installation and 1st Month Rent		Per Month (+ Install:	349	1.00	56.89	19854.61	
PERS Monthly Rent		Per Month	1656	9.00	33.83	504202.32	
Personal Emergency Response System MMCP	✓	Per Member Per Mo	150	12.00	0.01	18.00	
Skilled Nursing Total:							1083641.08
RN Nursing Services		Per 15 Minute Unit	136	33.00	10.19	45732.72	
LPN Nursing Services		Per 15 Minute Unit	116	619.00	7.31	524887.24	
Skilled Nursing MMCP	✓	Per Member Per Mo	471	12.00	0.01	56.52	
Nursing Supervisory Visits		Per Visit	5034	2.00	50.95	512964.60	
Specialized Medical Equipment and Supplies Total:							74058.50
Specialized Medical Equipment and Supplies MMCP	✓	Per Member Per Mo	6	12.00	0.01	0.72	
Specialized Medical Equipment and Supplies		Per Piece of Equipm	67	2.00	552.67	74057.78	
	Fac	Total: Services not in Total Estimated Undupli tor D (Divide total by numb Services in	cated Participants: er of participants): cluded in capitation: cluded in capitation:				91089730.60 226.68 91089503.92 11944 7626.40 0.02 7626.38

Appendix J: Cost Neutrality Demonstration

J-2: Derivation of Estimates (7 of 9)

d. Estimate of Factor D.

ii. Concurrent §1915(b)/§1915(c) Waivers, or other authorities utilizing capitated arrangements (i.e., 1915(a), 1932(a), Section 1937). Complete the following table for each waiver year. Enter data into the Unit, # Users, Avg. Units Per User, and Avg. Cost/Unit fields for all the Waiver Service/Component items. If applicable, check the capitation box next to that service. Select Save and Calculate to automatically calculate and populate the Component Costs and Total Costs fields. All fields in this table must be completed in order to populate the Factor D fields in the J-1 Composite Overview table.

Waiver Service/ Component	Capi-	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
Adult Day Health Total:	tation					Cost	195698.58
Adult Day Health MMCP	~	Per Member Per Mo	9	12.00	0.01	1.08	
Adult Day Health						195697.50	
Day Habilitation Total:		Per 15 Minute Unit	97	1345.00	1.50	19007100	27361.20
							27301.20
Day Habilitation		Per 15 Minute Unit	2	3020.00	4.53	27361.20	
Day Habilitation MMCP	✓	Per Member Per Mo	0	12.00	0.01	0.00	
Homemaker Total:							22057010.20
Homemaker MMCP	✓	Per Member Per Mo	205	12.00	0.01	24.60	
Homemaker		Per 15 Minute Unit	6940	764.00	4.16	22056985.60	
Residential Habilitation Total:							3984435.24
Residential Habilitation		Per Diem	26	350.00	437.85	3984435.00	
Residential Habilitation MMCP	✓	Per Member Per Mo	2	12.00	0.01	0.24	
Respite Total:							152793.72
Respite		Per 15 Minute Unit	99	371.00	4.16	152792.64	
Respite MMCP	✓	Per Member Per Mo	9	12.00	0.01	1.08	
Supported Employment Total:							37884.12
Supported Employment MMCP	✓	Per Member Per Mo	1	12.00	0.01	0.12	
Supported Employment		Per 15 Minute Unit	8	902.00	5.25	37884.00	
Attendant Care Total:							10799280.76
Attendant Care MMCP	✓	Per Member Per Mo	188	12.00	0.01	22.56	
Attendant Care		Per 15 Minute Unit	1996	1205.00	4.49	10799258.20	
Adult Residential Care Total:							48800860.16
Adult Residential Care		Per Diem	5314	248.00	37.03	48800800.16	
Adult Residential Care MMCP	✓	Per Member Per Mo	500	12.00	0.01	60.00	
Chore Service Total:							218821.76
Chore Service		Per 15 Minute Unit	359	152.00	4.01	218817.68	
	Fac	Total: Services not in Total Estimated Undupli tor D (Divide total by numb Services in	cated Participants: er of participants): cluded in capitation: cluded in capitation:				94733418.99 236.04 94733182.95 12422 7626.26 0.02 7626.24

Waiver Service/ Component	Capi- tation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost		
Chore Service MMCP	✓	Per Member Per Mo	34	12.00	0.01	4.08			
Companion Services Total:							3878490.72		
Companion Services MMCP	✓	Per Member Per Mo	52	12.00	0.01	6.24			
Companion Services		Per 15 Minute Unit	552	1689.00	4.16	3878484.48			
Consultation Total:							5252.40		
Consultation MMCP	✓	Per Member Per Mo	12	12.00	0.01	1.44			
Consultation		Per 15 Minute Unit	132	5.20	7.65	5250.96			
Environmental Accessibility Adaptations Total:							92646.56		
Environmental Accessibility Adaptations		Per Job	26	1.00	3563.32	92646.32			
Environmental Accessibility Adaptations MMCP	✓	Per Member Per Mo	2	12.00	0.01	0.24			
Home Delivered Meals Total:							2490090.36		
Home Delivered Meals		Per Meal	2184	218.00	5.23	2490065.76			
Home Delivered Meals MMCP	✓	Per Member Per Mo	205	12.00	0.01	24.60			
Non-medical Transportation Total:							246209.00		
Non-medical Transportation MMCP	✓	Per Member Per Mo	95	12.00	0.01	11.40			
Non-medical Transportation		Per Mile	1010	554.00	0.44	246197.60			
Personal Emergency Response System Total:							544967.13		
PERS Installation and 1st Month Rent		Per Month (+ Install:	363	1.00	56.89	20651.07			
PERS Monthly Rent		Per Month	1722	9.00	33.83	524297.34			
Personal Emergency Response System MMCP	✓	Per Member Per Mo	156	12.00	0.01	18.72			
Skilled Nursing Total:							1124242.44		
RN Nursing Services		Per 15 Minute Unit	142	33.00	10.19	47750.34			
LPN Nursing Services		Per 15 Minute Unit	120	619.00	7.31	542986.80			
Skilled Nursing MMCP	✓	Per Member Per Mo	490	12.00	0.01	58.80			
Nursing Supervisory Visits		Per Visit	5235	2.00	50.95	533446.50			
Specialized Medical Equipment and Supplies Total:							77374.64		
						0.84	94733418.99		
	GRAND TOTAL: Total: Services included in capitation: Total: Services not included in capitation: Total Estimated Unduplicated Participants: Factor D (Divide total by number of participants): Services included in capitation:								

Services included in capitation: Services not included in capitation:

Average Length of Stay on the Waiver:

7626.24

Waiver Service/ Component	Capi- tation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
Specialized Medical Equipment and Supplies MMCP	✓	Per Member Per Mo	7	12.00	0.01		
Specialized Medical Equipment and Supplies		Per Piece of Equipm	70	2.00	552.67	77373.80	
			94733418.99				
		Total: Services in	cluded in capitation:				236.04
		Total: Services not inc	cluded in capitation:				94733182.95
		Total Estimated Undupli	cated Participants:				12422
	Fac	tor D (Divide total by numb	er of participants):				7626.26
		Services in	cluded in capitation:				0.02
Services not included in capitation:							7626.24
Average Length of Stay on the Waiver:							285

Appendix J: Cost Neutrality Demonstration

J-2: Derivation of Estimates (8 of 9)

d. Estimate of Factor D.

ii. Concurrent §1915(b)/§1915(c) Waivers, or other authorities utilizing capitated arrangements (i.e., 1915(a), 1932(a), Section 1937). Complete the following table for each waiver year. Enter data into the Unit, # Users, Avg. Units Per User, and Avg. Cost/Unit fields for all the Waiver Service/Component items. If applicable, check the capitation box next to that service. Select Save and Calculate to automatically calculate and populate the Component Costs and Total Costs fields. All fields in this table must be completed in order to populate the Factor D fields in the J-1 Composite Overview table.

Waiver Service/ Component	Capi- tation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost			
Adult Day Health Total:							203768.70			
Adult Day Health MMCP	>	Per Member Per Mo	10	12.00	0.01	1.20				
Adult Day Health		Per 15 Minute Unit	101	1345.00	1.50	203767.50				
Day Habilitation Total:							27361.20			
Day Habilitation		Per 15 Minute Unit	2	3020.00	4.53	27361.20				
Day Habilitation MMCP	✓	Per Member Per Mo	0	12.00	0.01	0.00				
Homemaker Total:							22937383.64			
Homemaker MMCP	✓	Per Member Per Mo	213	12.00	0.01	25.56				
Homemaker		Per 15 Minute Unit	7217	764.00	4.16	22937358.08				
Residential Habilitation Total:							4137682.86			
Residential Habilitation		Per Diem	27	350.00	437.85	4137682.50				
Residential Habilitation MMCP	✓	Per Member Per Mo	3	12.00	0.01	0.36				
Respite Total:							158967.28			
GRAND TOTAL: Total: Services included in capitation: Total: Services not included in capitation: Total Estimated Unduplicated Participants: Factor D (Divide total by number of participants): Services included in capitation: Services not included in capitation: Average Length of Stay on the Waiver:										

Waiver Service/ Component	Capi- tation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost		
Respite		Per 15 Minute Unit	103	371.00	4.16	158966.08			
Respite MMCP	✓	Per Member Per Mo	10	12.00	0.01	1.20			
Supported Employment Total:							42619.62		
Supported Employment MMCP	✓	Per Member Per Mo	1	12.00	0.01	0.12			
Supported Employment		Per 15 Minute Unit	9	902.00	5.25	42619.50			
Attendant Care Total:							11232117.60		
Attendant Care MMCP	✓	Per Member Per Mo	195	12.00	0.01	23.40			
Attendant Care		Per 15 Minute Unit	2076	1205.00	4.49	11232094.20			
Adult Residential Care Total:							50747751.72		
Adult Residential Care		Per Diem	5526	248.00	37.03	50747689.44			
Adult Residential Care MMCP	✓	Per Member Per Mo	519	12.00	0.01	62.28			
Chore Service Total:							227964.68		
Chore Service		Per 15 Minute Unit	374	152.00	4.01	227960.48			
Chore Service MMCP	✓	Per Member Per Mo	35	12.00	0.01	4.20			
Companion Services Total:							4033068.24		
Companion Services MMCP	✓	Per Member Per Mo	54	12.00	0.01	6.48			
Companion Services		Per 15 Minute Unit	574	1689.00	4.16	4033061.76			
Consultation Total:							5451.42		
Consultation MMCP	✓	Per Member Per Mo	13	12.00	0.01	1.56			
Consultation		Per 15 Minute Unit	137	5.20	7.65	5449.86			
Environmental Accessibility Adaptations Total:							96210.00		
Environmental Accessibility Adaptations		Per Job	27	1.00	3563.32	96209.64			
Environmental Accessibility Adaptations MMCP	>	Per Member Per Mo	3	12.00	0.01	0.36			
Home Delivered Meals Total:							2589283.50		
Home Delivered Meals		Per Meal	2271	218.00	5.23	2589257.94			
Home Delivered Meals MMCP	✓	Per Member Per Mo	213	12.00	0.01	25.56			
Non-medical Transportation Total:							98513003.26		
GRAND TOTAL: Total: Services included in capitation: Total Services not included in capitation: Total Estimated Unduplicated Participants: Factor D (Divide total by number of participants): Services included in capitation: Services not included in capitation:									

Services included in capitation: Services not included in capitation:

Average Length of Stay on the Waiver:

7625.42

Waiver Service/ Component	Capi- tation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost	
							255959.88	
Non-medical Transportation MMCP	✓	Per Member Per Mo	99	12.00	0.01	11.88		
Non-medical Transportation		Per Mile	1050	554.00	0.44	255948.00		
Personal Emergency Response System Total:							566772.74	
PERS Installation and 1st Month Rent		Per Month (+ Install:	377	1.00	56.89	21447.53		
PERS Monthly Rent		Per Month	1791	9.00	33.83	545305.77		
Personal Emergency Response System MMCP	✓	Per Member Per Mo	162	12.00	0.01	19.44		
Skilled Nursing Total:							1169949.52	
RN Nursing Services		Per 15 Minute Unit	147	33.00	10.19	49431.69		
LPN Nursing Services		Per 15 Minute Unit	125	619.00	7.31	565611.25		
Skilled Nursing MMCP	✓	Per Member Per Mo	509	12.00	0.01	61.08		
Nursing Supervisory Visits		Per Visit	5445	2.00	50.95	554845.50		
Specialized Medical Equipment and Supplies Total:							80690.66	
Specialized Medical Equipment and Supplies MMCP	✓	Per Member Per Mo	7	12.00	0.01	0.84		
Specialized Medical Equipment and Supplies		Per Piece of Equipm	73	2.00	552.67	80689.82		
GRAND TOTAL: Total: Services included in capitation: Total: Services not included in capitation: Total Estimated Unduplicated Participants: Factor D (Divide total by number of participants): Services included in capitation: Services not included in capitation:							98513003.26 245.52 98512757.74 12919 7625.44 0.02 7625.42	
	Services not included in capitation: Average Length of Stay on the Waiver:							

Appendix J: Cost Neutrality Demonstration

J-2: Derivation of Estimates (9 of 9)

d. Estimate of Factor D.

ii. Concurrent §1915(b)/§1915(c) Waivers, or other authorities utilizing capitated arrangements (i.e., 1915(a), 1932(a), Section 1937). Complete the following table for each waiver year. Enter data into the Unit, # Users, Avg. Units Per User, and Avg. Cost/Unit fields for all the Waiver Service/Component items. If applicable, check the capitation box next to that service. Select Save and Calculate to automatically calculate and populate the Component Costs and Total Costs fields. All fields in this table must be completed in order to populate the Factor D fields in the J-1 Composite Overview table.

Waiver Service/ Component	Capi- tation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost		
Adult Day Health Total:							211838.70		
Adult Day Health MMCP	✓	Per Member Per Mo	10	12.00	0.01	1.20			
Adult Day Health		Per 15 Minute Unit	105	1345.00	1.50	211837.50			
Day Habilitation Total:							41041.80		
Day Habilitation		Per 15 Minute Unit	3	3020.00	4.53	41041.80			
Day Habilitation MMCP	✓	Per Member Per Mo	0	12.00	0.01	0.00			
Homemaker Total:							23855896.08		
Homemaker MMCP	✓	Per Member Per Mo	222	12.00	0.01	26.64			
Homemaker		Per 15 Minute Unit	7506	764.00	4.16	23855869.44			
Residential Habilitation Total:							4290930.36		
Residential Habilitation		Per Diem	28	350.00	437.85	4290930.00			
Residential Habilitation MMCP	✓	Per Member Per Mo	3	12.00	0.01	0.36			
Respite Total:							166684.08		
Respite		Per 15 Minute Unit	108	371.00	4.16	166682.88			
Respite MMCP	✓	Per Member Per Mo	10	12.00	0.01	1.20			
Supported Employment Total:							42619.62		
Supported Employment MMCP	✓	Per Member Per Mo	1	12.00	0.01	0.12			
Supported Employment		Per 15 Minute Unit	9	902.00	5.25	42619.50			
Attendant Care Total:							11681185.91		
Attendant Care MMCP	✓	Per Member Per Mo	203	12.00	0.01	24.36			
Attendant Care		Per 15 Minute Unit	2159	1205.00	4.49	11681161.55			
Adult Residential Care Total:							52777294.48		
Adult Residential Care		Per Diem	5747	248.00	37.03	52777229.68			
Adult Residential Care MMCP	✓	Per Member Per Mo	540	12.00	0.01	64.80			
Chore Service Total:							236498.20		
Chore Service		Per 15 Minute Unit	388	152.00	4.01	236493.76			
GRAND TOTAL: Total: Services included in capitation: Total: Services not included in capitation: Total Estimated Unduplicated Participants: Factor D (Divide total by number of participants): Services included in capitation: Services not included in capitation:									

Average Length of Stay on the Waiver:

Waiver Service/ Component	Capi- tation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost		
Chore Service MMCP	~	Per Member Per Mo	37	12.00	0.01	4.44			
Companion Services Total:							4194672.00		
Companion Services MMCP	✓	Per Member Per Mo	56	12.00	0.01	6.72			
Companion Services		Per 15 Minute Unit	597	1689.00	4.16	4194665.28			
Consultation Total:							5650.32		
Consultation MMCP	✓	Per Member Per Mo	13	12.00	0.01	1.56			
Consultation		Per 15 Minute Unit	142	5.20	7.65	5648.76			
Environmental Accessibility Adaptations Total:							99773.32		
Environmental Accessibility Adaptations		Per Job	28	1.00	3563.32	99772.96			
Environmental Accessibility Adaptations MMCP	✓	Per Member Per Mo	3	12.00	0.01	0.36			
Home Delivered Meals Total:							2693037.32		
Home Delivered Meals		Per Meal	2362	218.00	5.23	2693010.68			
Home Delivered Meals MMCP	✓	Per Member Per Mo	222	12.00	0.01	26.64			
Non-medical Transportation Total:							266198.28		
Non-medical Transportation MMCP	✓	Per Member Per Mo	103	12.00	0.01	12.36			
Non-medical Transportation		Per Mile	1092	554.00	0.44	266185.92			
Personal Emergency Response System Total:							589548.65		
PERS Installation and 1st Month Rent		Per Month (+ Install:	392	1.00	56.89	22300.88			
PERS Monthly Rent		Per Month	1863	9.00	33.83	567227.61			
Personal Emergency Response System MMCP	~	Per Member Per Mo	168	12.00	0.01	20.16			
Skilled Nursing Total:							1216706.29		
RN Nursing Services		Per 15 Minute Unit	153	33.00	10.19	51449.31			
LPN Nursing Services		Per 15 Minute Unit	130	619.00	7.31	588235.70			
Skilled Nursing MMCP	~	Per Member Per Mo	529	12.00	0.01	63.48			
Nursing Supervisory Visits		Per Visit	5662	2.00	50.95	576957.80			
Specialized Medical Equipment and Supplies Total:							84006.68		
						0.84			
			GRAND TOTAL: cluded in capitation:				102453582.09 255.24		
	Total: Services not included in capitation: Total Estimated Unduplicated Participants:								
	Fac	Total Estimated Undupli tor D (Divide total by numb					13436 7625.30		

Factor D (Divide total by number of participants):

Services included in capitation:

Services not included in capitation:

Average Length of Stay on the Waiver:

7625.30

0.02 7625.28

Waiver Service/ Component	Capi- tation	Unit	# Users	Avg. Units Per User	Avg. Cost/ Unit	Component Cost	Total Cost
Specialized Medical Equipment and Supplies MMCP	✓	Per Member Per Mo	7	12.00	0.01		
Specialized Medical Equipment and Supplies		Per Piece of Equipm	76	2.00	552.67	84005.84	
			102453582.09				
		Total: Services in	cluded in capitation:				255.24
		Total: Services not in	cluded in capitation:				102453326.85
		Total Estimated Undupli	cated Participants:				13436
	Fac	tor D (Divide total by numb	er of participants):				7625.30
		Services in	cluded in capitation:				0.02
			7625.28				
		285					